

WRPO Small Business

Initial Inspection Report

City of Vancouver
Water Resource Protection Ordinance
P.O. Box 1995
Vancouver, WA 98668
Office: 360-696-8008 Fax: 360- 696-8460



Operation Name:	Daisy Laundry & Dry Cleaning	Date:	12/7/04
Street Address:	8064 E Mill Plain Blvd.		
Zip Code:	98664		
Site Contact/Title:	Ki Chong / Owner	Phone:	694-0111
Inspectors:	Annette Jakubiak		

WRPO Location: Critical Aquifer Recharge Area

Background Search

Mr. Chong has been operating a dry cleaning and coin operated laundering facility at this location for the past 12 years. It is associated with an outdoor mini mall and is believed to have been constructed during the 1960s.

According to the Washington Department of Ecology web site, Daisy Laundry & Dry Cleaning received a No Further Action from the Voluntary Cleanup Program on 12/2/2003.

Operation Description

The dry cleaning transfer machine is over 30 years old. The perc washer holds an estimated 25 gallons of perchloroethylene (perc) in a tank in the back of the unit. The used perc is routed through a filter system consisting of 10 individual carbon cartridges, and then back to the tank. The filter system is situated over an area contained on three of the 4 sides. Used filters are stored in a plastic covered 55 gallon drum and hauled off by Technichem about once a year. Technichem last picked up filters in May of this year.

Approximately 30 gallons of perc are purchased every 2 to 3 months and stored in a 100 gallon capacity above ground storage tank (AST) located near the filter system. The perc is manually withdrawn from a spigot on the AST and added to the wash tank as needed.

After the clothes are spun to dryness in the washer, they are transferred by hand to the adjacent dryer. The dryer air is blown through a large carbon adsorber unit (sniffer) to capture the perc before venting outside to the atmosphere. The carbon is cleaned approximately once a month by boiling off the perc and condensing it for reuse. Water generated from the sniffer's separator is manually transferred into a mist unit where the residual perc is removed from the water before venting it outside.

A second separator located behind the dryer, operates continuously. Perc is gravity drained into a closed 5 gallon container and manually added to the washing machine for reuse. The separator water gravity drains into a closed 5 gallon container and then is manually added to the mist unit.

A dry to dry machine has been installed near the transfer machine, but it is not utilized. Mr. Chong feels the transfer machine performs much better than the dry to dry machine with fewer problems. He has 20 years of experience with the transfer machine.

Hazardous/Potentially Harmful Materials/Wastes			
Containers labeled? Yes, except for the perc storage tank.		Containers closed? Yes	
Floor drains? One 4" floor drain is located next to the sniffer unit. Three tubes discharge into the drain. One line is the drain line from the backflow preventor and the other two are cooling water lines used to condense perc from the dryer and the sniffer unit. The drain appeared to be inside a 4" metal containment containment, however, one side of the containment was composed of wood with multiple holes. The drain likely discharges to the sanitary sewer. The concrete floor appeared in tact.			
Documentation of hazardous waste shipments: Yes, but not reviewed. Technichem is the hauler.			
Comments? Mr. Chong thought the property owner had the mall sewer lines video taped and that the floor drain from Daisy Laundry & Dry Cleaning had been observed entering the line in the parking lot.			
Material	Hazardous Component	Amount	Comments/Location/Containment
Perc	Perchloroethylene	Est 40 gallons	Located in an above ground metal tank in an area behind the dry cleaning machines; container was closed and not labeled; no secondary containment.
Perc	Perchloroethylene	Est 25 gallons	Located in the back of the perc wash machine; no secondary containment
Used filters	Perchloroethylene	10 filters	Located in a covered drum near the filter system;
Separator water	Perchloroethylene	< 5 gal/week	Separator water is collected in 5 gallon containers and transferred to the mist unit
Spill Plans/Procedures			
Employee spill plan? No		Documented plan? No	
Spill kit available? No		Visible? No	Employee spill training? No
Comments: The owner and one full time person manage the operations.			
Outside Hazardous Material Use/Storage/Loading Areas			
No materials are stored outside.			
Stormwater Runoff			
No stormwater catch basins were observed near the shop.			
Miscellaneous			
USTs on site? No		Septic on site? No	
Water supply wells on site? No.			
Drywells/injection wells on site? Unknown.			
Comments: Daisy Laundry & Dry Cleaning carries insurance on its operation. Approximately two years ago, borings were drilled in the concrete adjacent to the filter system. Groundwater samples were collected as a condition of the business insurance. According to the Department of Ecology's web site, three 105-110 ft deep Resource Protection wells were decommissioned in March 2004. Well logs were not available through the web site.			
A copy of the Department of Ecology's <i>Dry Cleaner Reference Manual</i> (#01-04-018, January 2004) was given to Mr. Chong during the site visit.			

Comments/Conclusions

- Daisy Laundry and Dry Cleaning is an existing Class I operation as defined in the VMC 14.26 Water Resources Protection Ordinance due to the quantity of perchloroethylene managed on site.
- Since Daisy Laundry & Dry Cleaning was established before 2/3/03, it is considered an existing operation and only required to adopt portions of the Greater Standards for Hazardous Material Operations (VMC 14.26.130) as specified by the City. If Daisy Laundry & Dry Cleaning increases its volume of perc on-site to 163 gallons (2,200 pounds), it will be redefined as a New Class II operation per VMC 14.26.110 and would be required to adopt all aspects of the Greater Standards which include developing a spill plan and a closure plan, and providing training and periodic self-inspections.
- According to *VMC 14.26.117 Discharges to Water Resources*, any connection that could allow any material not composed entirely of surface or storm water directly to water resources is considered an unauthorized connection and is prohibited. If the floor drain does not discharge to the sanitary sewer, it needs to be permanently sealed and the three drain lines redirected to a nearby sanitary sewer line.
- Containers of hazardous materials are to be stored in a manner so that they do not threaten water resources. Double walled containers meet acceptable storage requirements no matter where they are stored. Single walled containers should be stored inside a building, with no floor drains, in an area able to contain 100 percent of the container in the event of a spill or leak. The lack of a complete containment around the floor drain could allow spills to enter the drain.

Action Items

1. Daisy Laundry & Dry Cleaning should notify the City of Vancouver Water Resources Protection Program (phone number 696-8008) in the event of a spill. According to *VMC 14.26.120 Minimum Standards*, City notification should include any hazardous material releases in amounts that clearly impact surface water, stormwater, or groundwater.
2. Confirm that the floor drain discharges to the sanitary sewer by 1/15/05. This can be accomplished by submitting copies of previous drain line tests or by performing a dye test of the floor drain. The City is available, upon request, to perform dye tests free of charge. If you would like a dye test performed, please contact Annette Jakubiak at 759-4481. Copies of previous tests can be submitted to:

Annette Jakubiak
City of Vancouver – Ops Center
P.O. Box 1995
Vancouver, WA 98668-1995
3. Depending upon the results of Action Item #2, the floor drain will either need to be permanently sealed or containment around the drain will need to be improved.

The City staff is available to assist property owners, business owners, and managers in addressing action items identified in the Inspection Report. Requests for technical assistance can be directed to Annette Jakubiak in the Water Resource Protection Program.

Report completed by: _____ Date: _____